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May 15, 2025

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
 United States District Court  
 District of New Jersey  
 Frank Lautenberg Post Office &  
 U.S. Courthouse  
 2 Federal Plaza, 3rd Floor  
 Newark, NJ 07102

Honorable Rukhsanah L. Singh, U.S.M.J.  
 United States District Court  
 District of New Jersey  
 Clarkson S. Fisher Building &  
 U.S. Courthouse  
 402 East State St.  
 Trenton, NJ 08608

**Re: *In re Insulin Pricing Litigation, No. 2:23-md-3080 (BRM/RLS) | MDL No. 3080***  
***Government of Puerto Rico v. Eli Lilly and Company et al., No. 25-cv-01845 (BRM/RLS)***

Dear Judges Martinotti and Singh:

Defendants Novo Nordisk Inc., Eli Lilly and Company, Eli Lilly Exports S.A., Sanofi-Aventis U.S. LLC and Sanofi-Aventis Puerto Rico, Inc. (collectively, “Manufacturer Defendants”) write in response to the Government of Puerto Rico’s (“Puerto Rico”) request for leave to file a Motion for Leave to Amend Complaint (Dkt. No. 554). Manufacturer Defendants agree with Defendants Caremark PCS Health, LLC, Caremark Puerto Rico LLC, Express Scripts, Inc., and OptumRx, Inc. that Puerto Rico’s request for leave to file a Motion for Leave to Amend should be denied, and accordingly join them in opposing Puerto Rico’s request (Dkt. No. 560).

We thank the Court for its time and continued attention to this matter.

Respectfully submitted,

/s/ Brian W. Carroll

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